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Tesla, Inc.

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

TESLA, INC., a Delaware corporation,

Plaintiff,

vs.

MARTIN TRIPP, an individual,

Defendant.

Case No. 3:18-cv-296

**DECLARATION OF ANDREW
LINDEMULDER IN SUPPORT OF
PLAINTIFF TESLA, INC.'S EMERGENCY
MOTION FOR AUTHORIZATION TO
ISSUE DOCUMENT PRESERVATION
SUBPOENAS**

DECLARATION OF ANDREW LINDEMULDER

I, Andrew Lindemulder, declare as follows:

1. I am an employee of Tesla, Inc., Plaintiff in this action. I have personal knowledge of the facts set forth in this Declaration and, if called as a witness, could and would testify competently to such facts under oath.

2. Earlier this month, Tesla opened an investigation into one of its employees, Defendant Martin Tripp, who was suspected of extracting confidential and trade secret information from Tesla's systems and sharing it with one or more third parties.

3. During an interview with me on June 14, 2018, Tripp admitted to transferring Tesla's confidential and trade secret data outside of the company, including via his personal email and cloud storage accounts with Apple (iCloud) and Microsoft (OneDrive and SharePoint). Tripp also admitted that he had been deleting such materials to "cover [his] tracks."

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on this 22nd day of June, 2018, at Sparks, Nevada.



Andrew Lindemulder